IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	07-CR-30068-JPG
	)	
LOWELL THOMAS LAKIN,	)	
	)	
Defendant.	)	

MOTION TO CONTINUE

Now comes the Defendant by and through his undersigned counsel and for his Motion states as follows:

1. This matter is set for a Non-Compliance Hearing on March 16, 2017.

2. Counsel for Defendant has a conflict that has arisen with another case in the Eastern District of Missouri on the same day.

3. The matter in Missouri is to set a case for trial in which the defendant has been separately indicted in a second case that largely involves the same alleged activities. The second case has been set for trial in September and Counsel needs to be at the hearing on March 16 to argue that the first case should be set so the trials are back to back rather than separated. The two cases have been pending for over two years and involve dozens of co-defendants and terabytes worth of digital discovery. If the cases are set too far apart they will require counsel to separately prepare for the cases rather than all at one time.

4. AUSA Stephen Clark has been consulted on this motion and has no objection on behalf of the Government.

5. Defense Counsel and AUSA Clark both have April 4, 6, or 7 available if any of those dates would be convenient for the Court.

Wherefore, Defendant moves this Court to continue the Non-Compliance Hearing as requested above.

Respectfully submitted,

s/ J. William Lucco

J. William Lucco, #01701835
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	)	
Defendant.	)	

Certificate of Service

I hereby certify that on 03/08/2017, I electronically filed a Motion to Continue with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Stephen B. Clark
stephen.clark@usdoj.gov

And I hereby certify that on 03/08/2017, I mailed by United States Postal Service, the document to the following non-registered participants:

None.

Respectfully submitted,

s/ J. William Lucco

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